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Filing date: **12/17/2021**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

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|------------------------|--|
| Proceeding | 92078395 |
| Party | Defendant Jersey Village Florist, LLC |
| Correspondence Address | JERSEY VILLAGE FLORIST, LLC 11152 WESTHEIMER ROAD #120 HOUSTON, TX 77042 UNITED STATES No email provided. No phone number provided. |
| Submission | Answer |
| Filer's Name | Rodney Drinnon |
| Filer's email | rdrinnon@mccathernlaw.com, agordon@mccathernlaw.com, scam-pos@mccathernlaw.com |
| Signature | /Rodney Drinnon/ |
| Date | 12/17/2021 |
| Attachments | 211217 Answer.pdf(146473 bytes) |

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
TRADEMARK TRIAL AND APPEAL BOARD**

In re: *Matter of Reg. No. 5,708,499 for the trademark
TEXAS GUNS AND ROSES.COM
& Design in Classes 6 and 35*

Guns N' Roses,

Petitioner,

v.

Jersey Village Florist, LLC,

Registrant.

Cancellation No. 92078395

Registration No. 5078499

ANSWER

Commissioner for Trademarks
ATTN: Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

ANSWER TO PETITION FOR CANCELLATION

Jersey Village Florist, LLC (“Registrant”), a Texas limited liability company, located and doing business in Houston, Harris County, Texas, answers the Petition of Guns N’ Roses (“Petitioner”), as follows:

1. Registrant lacks sufficient factual knowledge to admit or deny the allegations in paragraph 1 of the Petition for Cancellation, and accordingly, denies the same.
2. Registrant lacks sufficient factual knowledge to admit or deny the allegations in paragraph 2 of the Petition for Cancellation, and accordingly, denies the same.
3. The allegations in paragraph 3 of the Petition for Cancellation are admitted.
4. The allegations in paragraph 4 of the Petition for Cancellation are admitted.

5. Regarding paragraph 5 of the Petition for Cancellation, Registrant repeats and alleges each response in paragraphs 1 through 4 above as if fully set forth herein.

6. Registrant lacks sufficient factual knowledge to admit or deny the allegations in paragraph 6 of the Petition for Cancellation, and accordingly, denies the same.

7. The allegations in paragraph 7 of the Petition for Cancellation are denied.

8. Regarding paragraph 8 of the Petition for Cancellation, Registrant repeats and alleges each response in paragraphs 1 through 7 above as if fully set forth herein.

9. The allegations in paragraph 9 of the Petition for Cancellation are denied.

10. The allegations in paragraph 10 of the Petition for Cancellation are denied.

11. The allegations in paragraph 11 of the Petition for Cancellation are denied.

12. Regarding paragraph 12 of the Petition for Cancellation, Registrant repeats and alleges each response in paragraphs 1 through 11 above as if fully set forth herein.

13. Registrant denies the allegations in paragraph 13 of the Petition for Cancellation, except to admit that Registrant uses the TEXAS GUNS AND ROSES.COM & Design mark.

14. The allegations in paragraph 14 of the Petition for Cancellation are denied.

15. The allegations in paragraph 15 of the Petition for Cancellation are denied.

WHEREFORE, Registrant respectfully requests that the Petition for Cancellation be dismissed.

Dated: December 17, 2021

Respectfully submitted,

MCCATHERN

By: /Rodney Drinnon/

Rodney L. Drinnon

Federal Bar No. 6059446
Texas Bar No. 24047841
rdrinnon@mccathernlaw.com
ATTORNEY FOR REGISTRANT

CERTIFICATE OF SERVICE

I hereby certify that on this the 17th day of December, 2021 a true and correct copy of the foregoing and/or attached was served on each attorney of record or party in accordance with the TTAB's ESTTA online filing system.

/s/Rodney L. Drinnon